

EPA Comments

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I have three main comments. 1) The WQ documents use CUWA's judgement on the appropriate bromide WQ goal to minimize utility treatment costs and maximize their treatment flexibility. It is not apparent to me that this value, 50 ug/L, should be used as a benchmark to evaluate the various alternatives. A value of 100 ug/L or higher is legitimate and the use of a range, perhaps from 50-150 ug/L, is desirable. There is no absolute "drop-dead" value. Many if not most utilities will be able to comply with the upcoming bromate MCL at current bromide levels. 2) The Executive Summary of the WSEIA reports gross benefits from several alternatives. However, the costs of these alternatives have not been factored in, thus net benefits are unknown. Since it is net benefits that need to be assessed for the alternatives, it seems to me premature and misleading for judgements to be presented at this time. 3) The WSE documents specifically neglect the cost opportunities from water transfers and other alternative supplies (P3, WSEIA). These need to be included to help answer the general question if any alternative is cost effective (i.e., there is a positive net benefit).

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